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15 *Counsel for Defendant Meta Platforms, Inc.*

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

19 RICHARD KADREY, *et al.*,  
20 Individual and Representative Plaintiffs,  
21 v.  
22 META PLATFORMS, INC., a Delaware  
23 corporation;  
24 Defendant.

Case No. 3:23-cv-03417-VC-TSH

**DECLARATION OF JUDD LAUTER**

Discovery Cut-Off: December 13, 2024  
Date Action Filed: July 7, 2023

1 I, Judd Lauter, declare as follows:

2 1. I am a Special Counsel at the law firm of Cooley LLP and am counsel to Defendant  
3 Meta Platforms, Inc. ("Meta") in the above-captioned case. I have personal knowledge of the facts  
4 contained in this Declaration and, if called upon as a witness, could competently testify to them  
5 under oath.

6 2. Attached hereto as Exhibit 1 is a true and correct copy of an email sent by me to  
7 counsel for Plaintiffs on October 21, 2024.

8 3. Attached hereto as Exhibit 2 is a true and correct copy of Meta's responses and  
9 objections to Plaintiffs First Set of Requests for Production.

10 4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiffs' First Set of  
11 Requests for Production.

12 5. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiffs' Fifth Set of  
13 Requests for Production.

14 6. Attached hereto as Exhibit 5 is a true and correct copy of an email from my colleague  
15 Liz Stameshkin to counsel for Plaintiffs dated November 5

16 7. Attached hereto as Exhibit 6 is a true and correct copy of excerpts from Meta's  
17 responses to Plaintiffs' first set of Interrogatory responses.

18  
19 I declare under penalty of perjury that the foregoing is true and correct. Executed on this  
20 11<sup>th</sup> day of November 2024 at Berkeley, California

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22  
23 /s/ Judd Lauter  
Judd Lauter  
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